1	Law Offices of Shawn R. Perez SHAWN R. PEREZ, ESQ.		
2	7121 West Craig Rd, #113-38 Las Vegas, NV 89129 (702) 485-3977 (702)442-7095 shawn711@msn.com Attorney for Defendant		
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7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9	*** I		
10	UNITED STATES OF AMERICA,	Case No.: 2:17-cr-00160-JAD-VCF 2:17-cr-00035-JAD-GWF	
11	Plaintiff,	2:09-cr-00032-JAD-GWF	
12	VS.	STIPULATION AND PROPOSED ORDER TO CONTINUE	
13	DEANDRE NAKITA BROWN,	SENTENCING (Second Request)	
14	Defendant.	(Second Request)	
15			
16	IT IS HEREBY STIPULATED AND AGREED, by and between The United States		
17	of America, through Nicholas A. Trutanich, United States Attorney, and Nadia J. Ahmed and		
18	Alexandra M. Michael, Assistant United States Attorneys, and the defendant DEANDRE		
19	NAKITA BROWN, by and through his counsel, Shawn R. Perez, Esq., that good cause exists		
20	to continue the sentencing in this matter currently set for May 6, 2019, to May 14, 2019 at		
21	2:00 p.m.		
22	Good cause exists to extend the time for Sentencing because counsel for the		
23	Defendant will be out of state on the 6 th to attend his son's retirement ceremony from the		
24	United States Air Force. The Defendant is currently incarcerated and has no objection to the		
25	change of the date.		
26	The additional time requested herein is not sought for purposes of delay.		
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1	This is the second request to continue the Sentencing filed herein.		
2	DATED this 17 th day of April, 2019.		
3		Nicholas A. Trutanich,	
4		United States Attorney	
5	/s/ Shawn R. Perez, Esq.	/s/ Nadia J. Ahmed NADIA J. AHMED	
6	SHAWN R. PEREZ, ESQ. Counsel for Defendant	NADIA J. AHMED Assistant United States Attorney	
7	Counsel for Defendant Deandre Nakita Brown	/s/ Alexandra M. Michael	
8		ALEXANDRA MICHAEL Assistant United States Attorney	
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UNITED STATES DISTRICT COURT 1 DISTRICT OF NEVADA 2 *** 3 UNITED STATES OF AMERICA, Case Nos.: 2:17-cr-00160-JAD-VCF 4 2:17-cr-00035-JAD-GWF Plaintiff, 2:09-cr-00032-JAD-GWF 5 VS. PROPOSED ORDER ON 6 DEANDRE NAKITA BROWN, 7 (Second Request) Defendant. 8 9 Based on the representations by counsel and stipulation of counsel, good cause 10 appearing therefore, the Court finds that: 11 1. The parties agree to the continuance. 12 2. The defendant is incarcerated and does not object to the continuance. 13 3. Good cause exists to extend the time for Sentencing because of a calendaring 14 conflict 15 The denial of this request for continuance could result in a miscarriage of 5. 16 justice. 17 5. The additional time requested herein is not sought for purposes of delay. 18 This is the second request to continue the date set for the sentencing hearing 6. 19 date filed herein. 20 **ORDER** 21 IT IS THEREFORE ORDERED, that the Sentencing Hearing set for May 6, 2019, be 22 vacated and reset to May 15, 2019 at 2:00 p.m. 23 DATED this 19th day of April, 2019. 24 25 26

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